

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA (PITTSBURGH)**

IN RE:	)	BANKRUPTCY NO. 15-23207-JAD
	)	
WILLIAM J. BORLAK	)	Chapter 7
	)	
Debtor.	)	Document No.
	)	
Enterprise Bank,	)	Hearing: September 27, 2016
	)	at 10:00 am
	)	
Movant	)	<b>ANSWER TO MOTION FOR RELIEF</b>
	)	<b>FROM AUTOMATIC STAY</b>
	)	
	)	
vs.	)	
	)	
WILLIAM J. BORLAK, Debtor and	)	
ROSEMARY CRAWFORD, Chapter 7	)	
TRUSTEE,	)	
	)	
Respondents.	)	

**ANSWER TO MOTION FOR RELIEF FROM AUTOMATIC STAY**

AND NOW, comes the debtor, William J. Borlak, by and through his attorney, Max Feldman, Esquire, answers to movant's motion for Relief from Automatic Stay as follows:

1. Paragraph One of movant's motion is admitted.
2. Paragraph Two of movant's motion is admitted.
3. Paragraph Three of movant's motion is admitted.
4. Although it is admitted that debtor is in default under the terms of the note and mortgage, the remainder of the averment is denied. Upon reasonable investigation debtor is without knowledge or information sufficient to form a belief as to the truth of this averment

5. Paragraph Five of movant's motion is denied. Upon reasonable investigation debtor is without knowledge or information sufficient to form a belief as to the truth of this averment.

6. Paragraph Six of movant's motion is denied. Upon reasonable investigation debtor is without knowledge or information sufficient to form a belief as to the truth of this averment.

7. Paragraph Seven of movant's motion is admitted.

8. Paragraph Eight of movant's motion is admitted.

9. Paragraph Nine of movant's motion is an averment to which no response is required and is therefore denied.

10. Paragraph Ten of movant's motion is admitted.

11. Paragraph Eleven of movant's motion is denied. Upon reasonable investigation debtor is without knowledge or information sufficient to form a belief as to the truth of this averment.

12. Paragraph Twelve of movant's motion is admitted.

13. Paragraph Thirteen of movant's motion is denied and strict proof is demanded at the time of hearing.

14. Paragraph Fourteen of movant's motion is admitted.

15. Paragraph Fifteen of movant's motion is denied and strict proof is demanded at the time of hearing.

16. Paragraph Sixteen of movant's motion is denied and strict proof is demanded at the time of hearing.

WHEREFORE, Debtor respectfully requests this Honorable Court deny Movant's Motion for Relief from Automatic Stay.

Date: 8-30-2016

Respectfully submitted,

/s/ Max Feldman  
Max Feldman, Esquire  
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